

EXHIBIT 6

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO, LLC,)
Plaintiffs,)
- vs -) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939
OTTOMOTTO LLC; OTTO)
TRUCKING, LLC,)
Defendants.)

VIDEOTAPED DEPOSITION OF JOHN BARES,
a witness, called by the Plaintiff for examination,
in accordance with the Federal Rules of Civil
Procedure, taken by and before Tammie Elias, RPR and
Notary Public in and for the Commonwealth of
Pennsylvania, at the office of Reed Smith, 225 Fifth
Avenue, Suite 1200, Pittsburgh, Pennsylvania, on
Friday, June 16, 2017, commencing at 9:05 a.m.

JOB No. 2640097

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24 ALSO PRESENT:

25 Matthew Rethage, Videographer

1	Uber, what was his title?	09:21a
2	A. I don't know.	09:21a
3	Q. When did Mr. Levandowski start working for	09:21a
4	Uber?	09:21a
5	A. Can you clarify in what capacity?	09:21a
6	Q. Well, let's start with the earliest date	09:21a
7	Mr. Levandowski started working for Uber in	09:21a
8	any capacity?	09:22a
9	A. So to my knowledge it would have been early	09:22a
10	May, late April to early May 2016, when he was	09:22a
11	consulting for the company.	09:22a
12	Q. And how long was Mr. Levandowski consulting	09:22a
13	for the company?	09:22a
14	A. I believe from that period up through August	09:22a
15	18th plus or minus a few days when Uber	09:22a
16	acquired his company and therefore he became	09:22a
17	an employee.	09:22a
18	Q. What was Mr. Levandowski's title when he	09:22a
19	became an Uber employee?	09:22a
20	A. I don't know.	09:22a
21	Q. Have you ever heard of Mr. Levandowski	09:22a
22	referred to as Uber's vice president of	09:22a
23	engineering?	09:22a
24	A. Yes.	09:22a
25	Q. Was that his title at some point?	09:22a

1 week of May, yes, May of 2017.

09:24a

2 BY MR. JUDAH:

09:24a

3 Q. You referred earlier to consulting work

09:24a

4 Mr. Levandowski did starting in late April,

09:24a

5 early May 2016; is that correct?

09:24a

6 A. Correct.

09:24a

7 Q. Before that time, had Mr. Levandowski done any

09:24a

8 work for Uber?

09:25a

9 A. Not that I'm aware of.

09:25a

10 Q. Can you elaborate on the consulting work

09:25a

11 Mr. Levandowski did between late April, early

09:25a

12 May and August 2016?

09:25a

13 A. It was quite comprehensive. He would -- in

09:25a

14 his role he examined everything we were doing,

09:25a

15 from sensors to automotive OEM partners to

09:25a

16 software design, to mapping, to labeling,

09:25a

17 everything in the self-driving effort.

09:25a

18 Reviewed all of those pieces, gave comments

09:25a

19 and suggested, suggested change of direction,

09:25a

20 paths forward, how to improve what we were

09:25a

21 doing and gain higher speed.

09:26a

22 Q. Was Mr. Levandowski's consulting work, that

09:26a

23 included Lidar; correct?

09:26a

24 A. Yes. Yes, it did. [REDACTED]

09:26a

25 [REDACTED] 09:26a

1	2016?	11:10a
2	A. I was director and founder of ATC.	11:10a
3	Q. So between January 2015 and roughly June 2016	11:10a
4	--	11:11a
5	A. Correct.	11:11a
6	Q. -- you were director and founder of ATC?	11:11a
7	A. Correct.	11:11a
8	Q. What were your responsibilities in that	11:11a
9	capacity?	11:11a
10	A. Well, to put it in context, ATC at that time	11:11a
11	of decision by Travis, myself, Jeff Holden,	11:11a
12	that ATC would be what I think of as a	11:11a
13	semi-autonomous unit, autonomous not related	11:11a
14	to car technology. A very separate unit from	11:11a
15	the main Uber company, so my responsibilities	11:11a
16	were everything. We did our own real estate,	11:11a
17	we did our own recruiting, staffing, hiring.	11:11a
18	Virtually much like a startup company, though	11:11a
19	obviously we didn't have to fundraise, but	11:11a
20	responsibilities covered everything from real	11:11a
21	estate to technical design reviews.	11:11a
22	Q. Did Uber have any footprint in Pittsburgh	11:11a
23	before the founding of ATC?	11:11a
24	A. No. Other than Uber service, car service.	11:11a
25	Q. So I take it that the number of people	11:12a

1 COMMONWEALTH OF PENNSYLVANIA) CERTIFICATE
2 COUNTY OF INDIANA) SS:

3 I, Tammie Elias, RPR and Notary Public in and
4 for the Commonwealth of Pennsylvania, do hereby
5 certify that the witness, JOHN BARES, was by me
6 first duly sworn to testify to the truth; that the
7 foregoing deposition was taken at the time and place
8 stated herein; and that the said deposition was
9 recorded stenographically by me and then reduced to
10 printing under my direction, and constitutes a true
11 record of the testimony given by said witness.

12 I further certify that the inspection, reading
13 and signing of said deposition were NOT waived by
14 counsel for the respective parties and by the
15 witness.

16 I further certify that I am not a relative or
17 employee of any of the parties, or a relative or
18 employee of either counsel, and that I am in no way
19 interested directly or indirectly in this action.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand and affixed my seal of office this 19th day of
22 June, 2017.

23

24 <%signature%>

25 _____
Notary Public